

**FILED**

APR - 1 2011

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

TRACY WATSON, RENEE STALKER,  
OLIVIA STALKER, SHAFER WATSON, and  
RILEY WATSON,

Plaintiffs,

v.

CRAIG BLANK, WILLIAM HOYT, and CITY  
OF SAN JOSE,

Defendant.

**\*E-FILED\***

CASE NO. C-06-04029-RMW

**SPECIAL VERDICT FORM - DAMAGES**

## SPECIAL VERDICT FORM — DAMAGES

### Compensatory Damages

1. You have found that the William Hoyt violated the Constitutional Rights of Olivia Stalker. What is the amount of damages that will reasonably compensate Olivia Stalker for the deprivation of her Constitutional Rights caused by the defendant's conduct that resulted in your finding of liability? Note that you must return an award of at least One Dollar.

\$ 400,000

2. You have found the defendants violated the Constitutional Rights of Riley Watson. What is the amount of damages that will reasonably compensate Riley Watson for the deprivation of his Constitutional Rights caused by the defendants' conduct that resulted in your finding of liability? Note that you must return an award of at least One Dollar.

\$ 250,000

What percentage of the damages are attributable to each defendant?

Hoyt 25 %

Blank 75 %

3. You have found the defendants violated the Constitutional Rights of Shafer Watson. What is the amount of damages that will reasonably compensate Shafer Watson for the deprivation of his Constitutional Rights caused by the defendants' conduct that resulted in your finding of liability? Note that you must return an award of at least One Dollar.

\$ 250,000

What percentage of the damages are attributable to each defendant?

Hoyt 25 %

Blank 75 %

4. You have found that the defendants violated the Constitutional Rights of Tracy Watson. What is the amount of damages that will reasonably compensate Tracy Watson for the deprivation of his Constitutional Rights caused by the defendants' conduct that resulted in your finding of liability? Note that you must return an award of at least One Dollar.

\$ 175,000

What percentage of the damages are attributable to each defendant?

Hoyt 25 %

Blank 75 %

5. You have found that the defendants violated the Constitutional Rights of Renee Stalker. What is the amount of damages that will reasonably compensate Renee Stalker for the deprivation of her Constitutional Rights caused by the defendants' conduct that resulted in your finding of liability? Note that you must return an award of at least One Dollar.

\$ 175,000

What percentage of the damages are attributable to each defendant?

Hoyt 25 %

Blank 75 %

### Punitive Damages

1. In committing a constitutional violation in this case did Craig Blank do so with malice, oppression or reckless disregard of rights?

Yes ✓

No \_\_\_\_\_

If you answered "yes" and you determine that punitive damages should be awarded, what is the amount that you award?

\$ 1,500,000

2. In committing a constitutional violation in this case did William Hoyt do so with malice, oppression or reckless disregard of rights?

Yes ✓

No           

If you answered "yes" and you determine that punitive damages should be awarded, what is the amount that you award?

\$ 500,000

Dated: 4/1/2011

David Huff  
Foreperson  
David Huff